UNITED COATINGS
LONGEVITY BY DESIGN

RESEARCH AND DEVELOPMENT

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Comments on Title 24, Section 118(i) and Table 118-C

Twenty Five years ago UNITED COATINGS became the first producer of "100% Acrylic" elastomeric roof coatings, although we have been marketing acrylic roofing products since the early 1970's. Throughout the four decades that we have manufactured these coatings, our viewpoint has been that an energy saving coating should also be a serviceable membrane. This means that it must be permanently elastic, waterproof, and cabable of retarding the aging process of the underlying substrate, or insulation. It is our opinion that the standard promulgated by CEC does in fact accomplish all of these ends.

I have taken the liberty of addressing a few of the details debated in recent appeals on this standard below, however, UNITED COATINGS feels that adopting ASTM D6083 is the obvious resolution to the various specification arguments with respect to acrylic roof coatings, in that:.

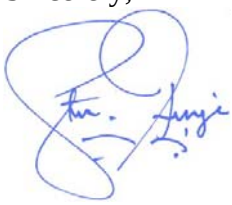
1. Material-wise, it is the same as the Title 24 specification.
2. Although it is the only broadly recognized standard for these products, it is one of a familty of ASTM material standards related to roofing. Other comparable standards should be listed as well. ASTM D6084 has the support of over four decades of successful case histories throughout the world.
3. A broad body of compliant products exists, complete with reports from certified labs (e.g.. Metro Dade County), that provide a basis for comparison – much like that provided by the CRRC program.
4. This same body of products provides a healthy competitive platform for improved economics.
5. It provides the best approach for maintaining consistency with other existing codes.
6. This standard screens for coatings that will perform in the broad range of climates found in the US, a goal consistent with the needs of California.
7. The 20-mil film used in the test could be interpreted as the specified thickness requirement, which would be appropriate. It is imperative that adequate film thickness be applied in order to bridge cracks, provide for nominal film thickness variations, and continued performance after a decade of exposure.

I could go into much more detail, however, when UNITED ran the Title 24 protocol on our products, we ended up with the same list of coatings that passed ASTM D6083. UNITED COATINGS has successfully marketed these products into the California market since the 1970's, so it makes little sense for us to endorse a change at this point.

One of the arguments presented against the use of ASTM D6083 is that it isn't appropriate for some of the more significant roofing substrates. While this is true, and to this extent makes ASTM D6083 arbitrary, the standard does allow for the use of a primer. With this allowance brought to bear, D6083-compliant systems can be used over all of the primary substrates. UNITED'S opinion is that ASTM D6083 is the most restrictive standard that can be applied without detriment, yet is restrictive enough to eliminate the use of inferior coatings systems.

At the heart of the confusion is the nature of the roof coatings business. These systems use as many as 13 different chemistries in providing products to coat upwards of ten significant roofing substrates. This variability has resulted in the development of relatively few specifications in the code and standards literature. In the long run, it is best to leverage the existing vetted ASTM material specifications in order to ensure the long-term performance of these roof coatings systems.

Sincerely,



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